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9 Attorneys for Defendant,  
10 FRONTIER AIRLINES, INC.

11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13

14 ANNE HEITING, an individual,  
15  
16 Plaintiff,  
17  
18 vs.  
19 FRONTIER AIRLINES, INC., a  
Colorado corporation; et al.,  
20  
21 Defendants.

CASE NO. 2:25-cv-01375 SPG (PDx)  
*[Assigned to Hon. Sherilyn Peace Garnett]*

**SECOND STIPULATION TO EXTEND  
DEFENDANT FRONTIER AIRLINES,  
INC.'S DEADLINE TO FILE ITS  
RESPONSIVE PLEADING**

22 IT IS HEREBY STIPULATED and AGREED by and between Plaintiff  
23 Anne Heiting ("Plaintiff") and Defendant Frontier Airlines, Inc. ("Defendant"),  
24 subject to the Court's approval, that Defendant's deadline to file its responsive  
25 pleading shall be extended 30 days, or until April 25, 2025. In support of this  
26 stipulation, the parties hereto state as follows:

27 1. On January 15, 2025, Plaintiff Anne Heiting (hereinafter "Plaintiff")  
28 commenced an action (the "Complaint") in the Superior Court of California,

1 County of Los Angeles, captioned *Anne Heiting v. Frontier Airlines, Inc.*, Case No.  
2 25STCV01092. Plaintiff asserted a cause of action under the “Trap and Trace  
3 Law” provision of the California Invasion of Privacy Act (“CIPA”), codified in Cal.  
4 Penal Code 630, et. seq.

5 2. On February 18, 2025, Defendant removed Plaintiff’s state court action  
6 to the United States District Court for the Central District of California.

7 3. Pursuant to Fed. R. Civ. P. 81(c), Defendant’s deadline to file a  
8 responsive pleading was seven (7) days after the notice of removal was filed, or, in  
9 this case, February 25, 2025.

10 4. The parties sought to extend Defendant’s deadline to file its responsive  
11 pleading in order to enhance the prospect of successful settlement discussions, and  
12 as such extended the deadline originally to March 27, 2025.

13 5. Defendant and Plaintiff have now agreed to extend the responsive  
14 deadline further in order to facilitate ongoing settlement negotiations.

15 6. Accordingly, the parties to this stipulation respectfully request that the  
16 Court approve the stipulation and extend Defendant’s deadline to file their  
17 responsive pleading.

18 DATED: March 27, 2025

Respectfully submitted,

19 TAULER SMITH LLP

20 /s/ Robert Tauler

21 Robert Tauler

22 Wendy Miele

23 Camrie Ventry

Attorneys for Plaintiff, Anne Heiting

24 FITZPATRICK, HUNT & PAGANO, LLP

25 /s/ Brian Maye

26 Brian T. Maye (*Pro Hac Vice*)

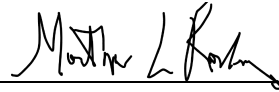
27 Edward Tarolli

28 Attorneys for Defendant,

Frontier Airlines, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 27<sup>th</sup> day of March 2025, a copy of the foregoing document was electronically filed with the Clerk of the Court at USDC, Central District of California, using CM/ECF system, which will send notification of such filing to all parties in this action.



Martha L. Rodriguez